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Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re) Case No. 16-30406-rld11
)
SeaPort Airlines, Inc.,) MOTION FOR AUTHORITY TO ENTER INTO
) SETTLEMENTS WITH FORMER PILOTS
Debtor-in-Possession.) WITHIN CERTAIN PARAMETERS

Debtor-in-Possession, SeaPort Airlines, Inc. ("Debtor"), moves the Court for an order authorizing the Debtor, without further notice or hearing, to enter into settlements on promissory notes which it holds executed by certain of Debtor's former pilots. The maximum amount of any note is \$7,500. The consideration for the notes is the cost of pilot training provided to former pilots, which the former pilots agreed to repay if they failed to remain within the company's employ for a minimum period of time.

Attached to this Motion marked **Exhibit A** is a list of the former pilots identified only by their initials, the original balances on the respective notes, and the current balances on the respective notes.

In order to minimize litigation costs, and to encourage prompt payment, for the limited time period of 60 days from the date of the entry of the Order granting this Motion,

Debtor requests permission to settle with any former pilot without further notice or hearing, so long as the settlement satisfies the following parameters:

Option 1: Cash lump sum payment no less than 75% of the original balance.

Option 2: Payment of the currently owed full amount, over six months, equal payments, no additional interest or fees as long as payments are made on time.

So long as the former pilot is negotiating in good faith (as determined by Debtor in the exercise of its reasonable business discretion), Debtor would have the option to suspend any additional interest or late fees owing on the obligation.

WHEREFORE, Debtor requests the Court enter an Order granting the foregoing Motion.

Respectfully submitted;

VANDEN BOS & CHAPMAN, LLP

By: /s/Robert J Vanden Bos
Robert J Vanden Bos, OSB #78100
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**FORMER PILOTS
RE BALANCES ON RESPECTIVE NOTES**

Promissory Notes Billed as of 3/14/2016 from SeaPort Airlines to previous pilot employees.				
Pilot Initials L/F	Initial Value Owed	Value at notification		
AF	\$ 302.20	\$ 302.20		
AA	\$ 5,276.50	\$ 5,276.50		
AJ	\$ 6,097.63	\$ 6,360.47		
BR	\$ 1,082.40	\$ 1,205.12		
BJ	\$ 6,167.24	\$ 6,176.24		
CF	\$ 7,500.00	\$ 10,510.20		
DJ	\$ 1,074.83	\$ 1,506.48		
DJ	\$ 7,500.00	\$ 7,500.00		
DC	\$ 4,405.19	\$ 4,405.19		
GG	\$ 3,455.56	\$ 3,455.56		
GK	\$ 4,989.70	\$ 6,936.01		
HJ	\$ 7,500.00	\$ 11,404.66		
JM	\$ 6,810.20	\$ 6,810.20		
JB	\$ 7,500.00	\$ 7,500.00		
JR	\$ 6,430.76	\$ 6,784.02		
MT	\$ 1,000.00	\$ 1,201.46		
MB	\$ 333.52	\$ 1,217.83		
PJ	\$ 5,000.00	\$ 5,000.00		
PD	\$ 1,007.23	\$ 1,251.35		
SJ	\$ 3,597.82	\$ 4,070.09		
SJ	\$ 3,637.73	\$ 3,637.73		
SJ	\$ 4,361.16	\$ 4,943.82		
SJ	\$ 1,076.42	\$ 1,076.42		
TK	\$ 4,800.28	\$ 4,800.28		
TJ	\$ 5,790.29	\$ 6,809.98		
WD	\$ 1,416.18	\$ 1,691.31		
WT	\$ 7,180.00	\$ 10,254.12		
Totals	\$ 115,292.84	\$ 132,087.24		

CERTIFICATE - TRUE COPY

DATE: March 25, 2016

DOCUMENT: MOTION FOR AUTHORITY TO ENTER INTO SETTLEMENTS
WITH FORMER PILOTS WITHIN CERTAIN PARAMETERS

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

SeaPort Airlines, Inc.
Attn: Timothy Sieber
7505 NE Airport Way
Portland, OR 97218

Michael J. Edelman
VEDDER PRICE
1633 Broadway
47th Floor
New York, New York 10019

Mark J. Wolfson
100 N Tampa St #2700
Tampa, FL 33602

Tulare County Tax Collector
Attn Jorge Garcia Depty
Tax Collector
221 S Mooney Blvd Rm 104-E
Visalia, CA 93291-4593

Franklin C. Adams
POB 1028
Riverside, CA 92502-1028

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: March 25, 2016

VANDEN BOS & CHAPMAN, LLP

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